

HACH ROSE SCHIRIPA & CHEVERIE LLP
ATTORNEYS AT LAW

January 19, 2023

VIA ELECTRONIC FILING

Honorable Thomas J. McAvoy
Senior U.S. District Judge
United States District Court
U.S. Courthouse and Federal Building
15 Henry Street
Binghamton, New York 13901

Re: Estate of Joseph P. King v. Anthony J. Annucci, *et al.*
Civil Action No.: 9:20-cv-1413-TJM/ML

Dear Judge McAvoy:

The undersigned is counsel to plaintiff, the Estate of Joseph P. King, by and through its Administratrix, Amy King ("Plaintiff") in the above referenced matter. We write to Your Honor in accordance with Local Rule 7.1(j) to respectfully request an extension of the return date and substantive motion deadlines for Plaintiff's opposition and reply papers. Defendants filed a Motion for Summary Judgment (ECF No. 71) on January 12, 2023.

We have consulted with Assistant Attorney General Aimee Cowan, of Counsel to Attorney General Letitia James, who consents to the proposed deadline extension as set forth below:

The date for submission of Plaintiff's Response to the Motion for Summary Judgment is extended from February 2, 2023, to March 17, 2023.

The date for submission of Defendants' Reply Brief in support of the Motion for Summary Judgment is extended from February 12, 2023, to March 27, 2023.

We thank Your Honor for this Honorable Court's courtesy and consideration.

HACH ROSE SCHIRIPA & CHEVERIE

By: /s/ Hillary Nappi
Hillary Nappi, Esq.

cc: Aimee Cowan, Esq. (*via ECF/email*)
Assistant Attorney General